

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MAHMOUD KHALIL,

Petitioner,

V.

WILLIAM P. JOYCE, *et al.*,

Respondents.

NO. 25-cv-1963 (MEF) (MAH)

DECLARATION OF ACTING FIELD OFFICE
DIRECTOR BRIAN S. ACUNA

DECLARATION OF ACTING FIELD OFFICE DIRECTOR BRIAN S. ACUNA

I, Brian S. Acuna, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am employed by U.S. Department of Homeland Security (“DHS”), U.S. Immigration and Customs Enforcement (“ICE”), Enforcement and Removal Operations (“ERO”), and currently serve as Acting Field Office Director (“Acting FOD”) at the New Orleans Office. I have held this position since May 12, 2025. I have been employed by ICE, and the former Immigration and Naturalization Service, in various capacities since April 1997.
2. In my current position, I oversee several aspects of the immigration enforcement process, including the identification and arrest, transportation, detention, case management, and removal of noncitizens. In this capacity, I manage ERO personnel and provide oversight over a number of detention facilities within the New Orleans Field Office, including the Central Louisiana ICE Processing Center (“CLIPC”) in Jena, Louisiana.
3. I am aware that Mahmoud Khalil (“Khalil”) has filed a Petition for a Writ for Habeas Corpus before this Court.

4. I am aware of a request sent to the CILPC facility on May 19, 2025, at 9:14 p.m. Central Time by Khalil's attorney, requesting extended contact visitation by Khalil's wife, Dr. Noor Abdalla, for the maximum amount of time possible.
5. I am aware of the response by the facility on May 20, 2025, at 7:33 a.m. informing counsel that the request for visitation extensions was approved and provided the specific times Dr. Abdalla could visit. Additionally, the response informed counsel CLIPC does not offer contact visitation.
6. I am aware of an email from Nora Ahmed, Legal Director of the American Civil Liberties Union of Louisiana, on May 20, 2025, at 2:05 p.m. requesting an exception to the no contact visitation policy at CILPC.
7. I am aware of the response by the facility on May 20, 2025, at 3:02 p.m. stating facility procedures are for non-contact visitation only and the visit would remain on schedule for non-contact as previously approved.
8. I am aware Ms. Ahmed sent a second request on May 20, 2025, at 4:46 p.m. requesting an exception to CILPC's non-contact visitation policy. An additional follow-up email was received on May 21, 2025, at 9:08 a.m. from Ms. Ahmed.
9. I am aware the facility responded on May 21, 2025, at 9:31 a.m. stating the visit would remain non-contact as previously arranged.
10. The facility provided a one-time exception on May 21, 2025, to allow Mr. Khalil to meet in a training room with four of his attorneys, which is larger than the visitation rooms, in preparation for the immigration hearing that was held on May 22, 2025.
11. I am aware the facility provided a one-time exception for Mr. Khalil to have a contact visit with his wife and child in the LaSalle Immigration Courtroom number 1, as well as

a concurrent meeting with his legal team, from 7:00-8:00 a.m. on May 22, 2025.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of June 2025.

**BRIAN S
ACUNA**

Digitally signed by
BRIAN S ACUNA
Date: 2025.06.07
21:25:57 -05'00'

Brian S. Acuna, Acting Field Office Director
New Orleans Field Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement